

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

UNITED STATES OF AMERICA

v.

ROBERT M. FELDMAN,

Defendant.

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Criminal No. WDQ-13-0457

(UNDER SEAL)

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MOTION TO SEAL INFORMATION

The United States of America, by its attorneys, Rod J. Rosenstein, United States Attorney for the District of Maryland, and Martin J. Clarke, Assistant United States Attorney for said District, moves this Honorable Court for an order sealing the Information in the above-captioned matter.

1. The defendant, Robert M. Feldman, is represented by counsel and has entered into a plea agreement with the government.

2. Under the plea agreement, the defendant has agreed to cooperate in the ongoing grand jury investigation of others involved in the conspiracy to commit wire fraud.

3. Premature disclosure of the existence of the investigation would seriously jeopardize the government's ability to bring the other co-conspirators to justice and seize the illegal proceeds of the scheme.

4. Counsel for the defendant, Henry Hockeimer, Esquire, has authorized the government to state that his client joins in the request to seal the Information.

WHEREFORE, the government requests that this Motion, the Order, the Information and all other documents filed in this action be **sealed** until further order of the Court, and that one (1) copy of the signed Information be provided by the Clerk to the United States Attorney's Office.

Respectfully submitted,

Rod J. Rosenstein
United States Attorney

By: 

Martin J. Clarke
Assistant United States Attorney